

BEFORE THE  
BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

**JOSH SINGH GREWAL**  
**a.k.a. JASHANDEEP SINGH GREWAL**  
**6557 Tokay Road**  
**Tujunga, CA 91042**

**Registered Nurse License No. 679290**  
**Public Health Nurse Certificate No. 78743**

Respondent

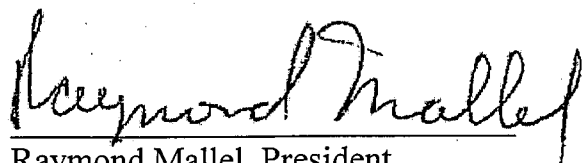
Case No. 2012-683

**DECISION AND ORDER**

The attached Stipulated Surrender of License and Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on **September 12, 2012.**

IT IS SO ORDERED **September 12, 2012.**



Raymond Mallel, President  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California

1 KAMALA D. HARRIS  
Attorney General of California  
2 ARTHUR D. TAGGART  
Supervising Deputy Attorney General  
3 BRIAN S. TURNER  
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*Attorneys for Complainant*

8  
9 **BEFORE THE**  
**BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. 2012-683

12 **JOSH SINGH GREWAL, A.K.A.**  
13 **JASHANDEEP SINGH GREWAL**  
6557 Tokay Road  
14 Tujunga, CA 910420

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

15 **Registered Nurse License No. 679290**  
**Public Health Nurse Certificate No. 78743**

16 Respondent.

17  
18 **IT IS STIPULATED AND AGREED** by and between the parties in this proceeding that  
19 the following matters are true:

20 **PARTIES**

21 1. Louise R. Bailey, M.Ed., RN (Complainant) is the Interim Executive Officer of the  
22 Board of Registered Nursing (Board). She brought this action solely in her official capacity and  
23 is represented in this matter by Kamala D. Harris, Attorney General of the State of California, by  
24 Brian S. Turner, Deputy Attorney General.

25 2. Josh Singh Grewal, a.k.a. Jashandeep Singh Grewal (Respondent) is representing  
26 himself in this proceeding and has chosen not to exercise his right to be represented by counsel.

27 3. On or about May 15, 2006, the Board issued Registered Nurse License No. 679290 to  
28 Josh Singh Grewal, a.k.a. Jashandeep Singh Grewal. The Registered Nurse License was in full

1 force and effect at all times relevant to the charges brought in Accusation No. 2012-683 and will  
2 expire on September 30, 2013, unless renewed.

3 4. On or about September 29, 2010, the Board issued Public Health Nurse Certificate  
4 No. 78743 to Josh Singh Grewal, a.k.a. Jashandeep Singh Grewal. The Public Health Nurse  
5 Certificate was in full force and effect at all times relevant to the charges brought in Accusation  
6 No. 2012-683 and will expire on September 30, 2013, unless renewed.

7 **JURISDICTION**

8 5. Accusation No. 2012-683 was filed before the Board, Department of Consumer  
9 Affairs, and is currently pending against Respondent. The Accusation and all other statutorily  
10 required documents were properly served on Respondent on May 3, 2012. Respondent timely  
11 filed his Notice of Defense contesting the Accusation. A copy of Accusation No. 2012-683 is  
12 attached as Exhibit A and incorporated by reference.

13 **ADVISEMENT AND WAIVERS**

14 6. Respondent has carefully read, and understands the charges and allegations in  
15 Accusation No. 2012-683. Respondent also has carefully read, and understands the effects of this  
16 Stipulated Surrender of License and Order.

17 7. Respondent is fully aware of his legal rights in this matter, including the right to a  
18 hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at  
19 his own expense; the right to confront and cross-examine the witnesses against him; the right to  
20 present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel  
21 the attendance of witnesses and the production of documents; the right to reconsideration and  
22 court review of an adverse decision; and all other rights accorded by the California  
23 Administrative Procedure Act and other applicable laws.

24 8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and  
25 every right set forth above.

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14. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Order:

## ORDER

**IT IS ORDERED** that Registered Nurse License No. 679290 and Public Health Nurse Certificate No. 78743 issued to Respondent Josh Singh Grewal, a.k.a. Jashandeep Singh Grewal, are **SURRENDERED** and **ACCEPTED** by the Board of Registered Nursing.

1. The surrender of Respondent's Registered Nurse License and Public Health Nurse Certificate and the acceptance of the surrendered license and certificate by the Board shall constitute the imposition of discipline against Respondent. This stipulation constitutes a record of the discipline and shall become a part of Respondent's license history with the Board of Registered Nursing.

2. Respondent shall lose all rights and privileges as a Registered Nurse and Public Health Nurse in California on the effective date of the Board's Decision and Order.

3. Respondent shall cause to be delivered to the Board his pocket license and certificate and any and all wall certificates on or before the effective date of the Decision and Order.

4. If Respondent ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked license in effect at the time the petition is filed, and all of the charges and allegations contained in Accusation No. 2012-683 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

5. If and when Respondent's license is reinstated, he shall pay to the Board costs associated with its investigation and enforcement pursuant to Business and Professions Code section 125.3 in the amount of \$3,110. Respondent shall be permitted to pay these costs in a payment plan approved by the Board. Nothing in this provision shall be construed to prohibit the Board from reducing the amount of cost recovery upon reinstatement of the license.

6. If Respondent should ever apply or reapply for a new license or certification, or petition for reinstatement of a license, by any other health care licensing agency in the State of

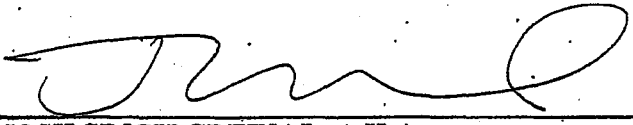
1 California, all of the charges and allegations contained in Accusation, No. 2012-683 shall be  
2 deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of  
3 Issues or any other proceeding seeking to deny or restrict licensure.

4 7. Respondent shall not apply for licensure or petition for reinstatement for two (2)  
5 years from the effective date of the Board of Registered Nursing's Decision and Order.  
6

7 ACCEPTANCE

8 I have carefully read the Stipulated Surrender of License and Order. I understand the  
9 stipulation and the effect it will have on my Registered Nurse License, and Public Health Nurse  
10 Certificate. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly,  
11 and intelligently, and agree to be bound by the Decision and Order of the Board of Registered  
12 Nursing.

13  
14 DATED: 5/22/12

  
15 JOSH SINGH GREWAL, A.K.A.  
16 JASHANDEEP SINGH GREWAL  
Respondent

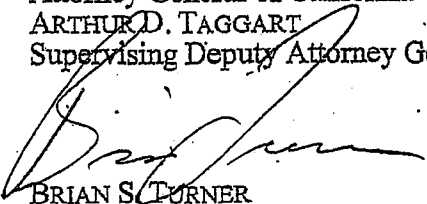
17 ENDORSEMENT

18 The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted  
19 for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

20 Dated: May 30/2012

21 Respectfully submitted,

22 KAMALA D. HARRIS  
Attorney General of California  
23 ARTHUR D. TAGGART  
Supervising Deputy Attorney General

24   
25 BRIAN S. TURNER  
26 Deputy Attorney General  
27 Attorneys for Complainant  
28

**Exhibit A**

**Accusation No. 2012-683**

1 KAMALA D. HARRIS  
Attorney General of California  
2 ARTHUR D. TAGGART  
Supervising Deputy Attorney General  
3 BRIAN S. TURNER  
Deputy Attorney General  
4 State Bar No. 108991  
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Sacramento, CA 94244-2550  
6 Telephone: (916) 445-0603  
Facsimile: (916) 327-8643  
7 *Attorneys for Complainant*

8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
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11 In the Matter of the Accusation Against:

Case No. **2012-683**

12 **JOSE SINGH GREWAL, A.K.A.**  
13 **JASHANDEEP SINGH GREWAL**  
14 **6557 Tokay Road**  
**Tujunga, CA 91042**

**ACCUSATION**

15 **Registered Nurse License No. 679290**  
16 **Public Health Nurse Certificate No. 78743**

17 **Respondent.**

18 **Complainant alleges:**

19 **PARTIES**

20 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her  
21 official capacity as Interim Executive Officer of the Board of Registered Nursing ("Board"),  
22 Department of Consumer Affairs.

23 **Registered Nurse License**

24 2. On or about May 15, 2006, the Board issued Registered Nurse License Number  
25 679290 to Josh Singh Grewal ("Respondent"), also known as Jashandeep Singh Grewal. The  
26 registered nurse license was in full force and effect at all times relevant to the charges brought  
27 herein and will expire on September 30, 2013, unless renewed.

28 ///



1       **Public Health Nurse Certificate**

2       3.     On or about September 29, 2010, the Board issued Public Health Nurse Certificate  
3     Number 78743 to Respondent. The public health nurse certificate was in full force and effect at  
4     all times relevant to the charges brought herein and will expire on September 30, 2013, unless  
5     renewed.

6                               **JURISDICTION**

7       4.     Section 2750 of the Business and Professions Code ("Code") provides, in pertinent  
8     part, that the Board may discipline any licensee, including a licensee holding a temporary or an  
9     inactive license, for any reason provided in Article 3 (commencing with section 2750) of the  
10    Nursing Practice Act.

11    5.     Code section 2764 provides, in pertinent part, that the expiration of a license shall not  
12    deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or  
13    to render a decision imposing discipline on the license. Under Code section 2811, subdivision  
14    (b), the Board may renew an expired license at any time within eight years after the expiration.

15                               **STATUTORY PROVISIONS**

16    6.     Code section 2761 states, in pertinent part:

17             The board may take disciplinary action against a certified or licensed  
18     nurse or deny an application for a certificate or license for any of the following:

19             (f) Conviction of a felony or of any offense substantially related to the  
20     qualifications, functions, and duties of a registered nurse, in which event the record of  
21     the conviction shall be conclusive evidence thereof.

22    7.     Code section 2762 states, in pertinent part:

23             In addition to other acts constituting unprofessional conduct within the  
24     meaning of this chapter [the Nursing Practice Act], it is unprofessional conduct for a  
25     person licensed under this chapter to do any of the following:

26             (b) Use any controlled substance as defined in Division 10 (commencing  
27     with Section 11000) of the Health and Safety Code, or any dangerous drug or  
28     dangerous device as defined in Section 4022, or alcoholic beverages, to an extent or  
29     in a manner dangerous or injurious to himself or herself, any other person, or the  
30     public or to the extent that such use impairs his or her ability to conduct with safety to  
31     the public the practice authorized by his or her license.

32             (c) Be convicted of a criminal offense involving the prescription,  
33     consumption, or self-administration of any of the substances described in  
34     subdivisions (a) and (b) of this section, or the possession of, or falsification of a

1 record pertaining to, the substances described in subdivision (a) of this section, in  
2 which event the record of the conviction is conclusive evidence thereof.

3 (e) Making or giving any false statement or information in connection  
4 with the application for issuance of a certificate or license.

#### 5 COST RECOVERY

6 8. Code section 125.3 provides, in pertinent part, that the Board may request the  
7 administrative law judge to direct a licensee found to have committed a violation or violations of  
8 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
9 enforcement of the case.

#### 10 FIRST CAUSE FOR DISCIPLINE

##### 11 (Criminal Convictions)

12 9. Respondent has subjected his licenses to discipline pursuant to Code sections  
13 2761, subdivision (f) in that Respondent has been convicted of the following crimes that are  
14 substantially related to the qualifications, functions, or duties of a registered nurse:

15 a. On or about November 24, 2010, in the Superior Court, County of Los Angeles,  
16 California, in the matter entitled *People vs. Josh Singh Grewal*, 2010, Case No. PA067518,  
17 Respondent was convicted following his plea of nolo contendere to a violation of Vehicle Code  
18 section 23152, subdivision (b) (driving with a blood alcohol level of .08% or more), a felony.  
19 The circumstances of the crime are that on August 29, 2010, Respondent was arrested for driving  
20 under the influence of alcohol, following a traffic stop. Respondent's blood alcohol level  
21 measured .29%, and .26%. Respondent was ordered to serve a term of two years in state prison to  
22 run concurrent with the sentence in subparagraph b, below.

23 b. On or about November 24, 2010, in the Superior Court, County of Los Angeles,  
24 California, in the matter entitled *People vs. Josh Singh Grewal*, 2010, Case No. PA067559  
25 Respondent was convicted following his plea of nolo contendere to a violation of Vehicle Code  
26 section 23152, subdivision (b) (driving with a blood alcohol level of .08% or more), a felony.  
27 The circumstances of the crime are that on September 3, 2010, Respondent was arrested for  
28 driving under the influence of alcohol, following a traffic accident. Respondent left the accident  
scene on foot and subsequently found at his residence located within a few blocks of the accident.

1 Respondent's blood alcohol level measured .35%, and .33%. Respondent was ordered  
2 to serve a term of two years in state prison to run concurrent with the sentence in subparagraph a,  
3 above.

#### 4 SECOND CAUSE FOR DISCIPLINE

##### 5 (Conviction of Crimes Involving Alcohol)

6 10. Respondent has subjected his licenses to discipline pursuant to Code section 2762,  
7 subdivision (a), on the grounds of unprofessional conduct, as defined by Code section 2762,  
8 subdivision (c), in that Respondent has been convicted of crimes involving the consumption of  
9 alcohol, as more particularly set forth in paragraph 9, subparagraphs a and b, above.

#### 10 THIRD CAUSE FOR DISCIPLINE

##### 11 (Use Alcohol to an Extent or in a Manner Dangerous or Injurious)

12 11. Respondent has subjected his licenses to discipline pursuant to Code section 2762,  
13 subdivision (a), on the grounds of unprofessional conduct, as defined by Code section 2762,  
14 subdivision (b), in that on or about August 29, 2010, and September 3, 2010, Respondent used  
15 alcohol to an extent or in a manner dangerous or injurious to himself or others, as more  
16 particularly set forth in paragraphs 9 and 10, above.

#### 17 FOURTH CAUSE FOR DISCIPLINE

##### 18 (Provide False Information in an Application)

19 12. Respondent has subjected his licenses to discipline pursuant to Code section 2762,  
20 subdivision (e), in that in his Request for Reapply/Repeat Examination dated September 6, 2005,  
21 Respondent answered "No" to the question that asks "Have you ever had disciplinary proceedings  
22 against any license as a RN or any health-care related license including revocation, suspension,  
23 probation, voluntary surrender, or any other proceeding in any state or country?" The  
24 Reapplication further provides the applicant must report any disciplinary action by any health-  
25 care related licencing agency between the submission of the reapplication and the date a  
26 registered nurse license is issued.

27 On or about October 6, 2005, the Board of Vocational Nursing and Psychiatric  
28 Technicians issued Citation Number 05-0083-L against Respondent's Vocational Nurse License

1 Number 143421, including charges for failure to inform the Board of criminal convictions.

2 Respondent complied with the discipline ordered in the citation on October 26, 2005.

3 Respondent did not report the citation to the Board of Registered Nursing as required by the  
4 express terms of the reapplication.

5 **DISCIPLINARY CONSIDERATIONS**

6 13. On or about May 20, 2002, the Board received an Application for Licensure by  
7 Examination from Respondent. On or about March 20, 2003, a Statement of Issues was filed by  
8 the Board denying the Application for Licensure by Examination. On or about February 11,  
9 2004, a First Amended Statement of Issues was filed by the Board and on or about April 22,  
10 2004, a Default Decision and Order was filed by the Board due to Respondent's failure to respond  
11 to the Statement of Issues and First Amended Statement of Issues served on Respondent. The  
12 basis for denial was that Respondent had been convicted of the following crimes that are  
13 substantially related to the qualifications, functions or duties of a registered nurse:

14 a. On or about July 7, 2003, in the Superior Court, Los Angeles County, California,  
15 in the matter entitled *People vs. Jashandeep Singh Grewal*, 2003, Case No. PA041672,  
16 Respondent was convicted by the court following his plea of nolo contendere to a violation of  
17 Vehicle Code section 23153, subdivision (b) (driving with a blood alcohol level of .08% or more  
18 causing bodily injury), a felony. The circumstances of the crime are that on or about February 21,  
19 2003, Respondent, while driving under the influence of alcohol with a greater than .08% blood  
20 alcohol level, caused bodily injury to Deanna J. and Reina C.

21 b. On or about June 12, 2001, in the Municipal Court, County of Los Angeles, San  
22 Fernando Judicial District, California, in the matter entitled *People vs. Jashandeep Singh Grewal*,  
23 2001, Case No. 1SF00751, Respondent was convicted by the court following his plea nolo  
24 contendere to a violation of Vehicle Code section 23152, subdivision (b) (driving with a blood  
25 alcohol level of .08% or more), a misdemeanor. The circumstances of the crime are that on or  
26 about February 24, 2001, Respondent was found in his parked car in an intoxicated condition.  
27 Respondent admitted to the arresting officer that he had been driving the vehicle earlier.  
28 Respondent's blood alcohol level measured .22%.

1 c. On or about December 12, 1997, in the Municipal Court, County of Los Angeles,  
2 Newhall Judicial District, California, in the matter entitled *People vs. Jashandeep Singh Grewal*,  
3 1997, Case No. 7NE04149, Respondent was convicted by the court following his plea of nolo  
4 contendere to a violation of Penal Code section 273.5, subdivision (a) (inflicting corporal injury  
5 on a spouse), a misdemeanor. The circumstances of the crime are that on or about November 19,  
6 1997, Respondent was arrested for inflicting corporal injury on his girlfriend the night before.

7 d. On or about December 12, 1996, in the Municipal Court, County of Los Angeles,  
8 Newhall Judicial District, California, in the matter entitled *People vs. Jashandeep Singh Grewal*,  
9 1996, Case No. 6NE03259, Respondent was convicted by the court following his plea of nolo  
10 contendere to a violation of Penal Code section 12034, subdivision (d) (discharge a firearm from  
11 a vehicle), a misdemeanor. The circumstances of the crime are that on or about October 12, 1996,  
12 Respondent was arrested for discharging a firearm in a grossly negligent manner, and for carrying  
13 a concealed weapon within a vehicle.

14 e. On or about December 4, 1990, in the Municipal Court, County of Los Angeles,  
15 San Fernando Judicial District, California, in the matter entitled *People vs. Jashandeep Singh*  
16 *Grewal*, 1990, Case No. 90F12692, Respondent was convicted by the court following his plea of  
17 guilty to a violation of Los Angeles Municipal Code section 63.94 (enter/trespass on school  
18 grounds), a misdemeanor. The circumstances of the crime are that on or about November 9,  
19 1990, Respondent was arrested by the Los Angeles Airport Police Department for entering or  
20 remaining on the grounds, property, or building of a public school in violation of posted rules  
21 regarding the use of school property.

22 14. On or about October 6, 2005, the Board of Vocational Nursing and Psychiatric  
23 Technicians issued Citation Number 05-0083-L against Respondent's Vocational Nurse License  
24 Number 143421, which included a fine in the amount of \$750. The basis for the citation was that  
25 on his Self Certification statements dated September 1, 2002, and July 24, 2004, for renewal of  
26 that license, Respondent answered "No" to the question "Since you last renewed your license,  
27 have you been convicted of or pled nolo contendere to any violation of any law in the United  
28 States or a foreign country". In fact, Respondent had been convicted of crimes, as more

1 particularly set forth in subparagraphs b through e, of paragraph 12, above.

2 PRAYER

3 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
4 and that following the hearing, the Board of Registered Nursing issue a decision:

5 1. Revoking or suspending Registered Nurse License Number 679290, issued to Josh  
6 Singh Grewal, also known as Jashandeep Singh Grewal;

7 2. Revoking or suspending Public Health Nurse Certificate Number PHN 78743, issued  
8 to Josh Singh Grewal, also known as Jashandeep Singh Grewal;

9 3. Ordering Josh Singh Grewal, also known as Jashandeep Singh Grewal to pay the  
10 Board of Registered Nursing the reasonable costs of the investigation and enforcement of this  
11 case, pursuant to Business and Professions Code section 125.3; and,

12 4. Taking such other and further action as deemed necessary and proper.

13  
14  
15 DATED: May 3, 2012

Louise R. Bailey  
LOUISE R. BAILEY, M.ED., RN  
Interim Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
Complainant